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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JOHN and JOANN DOE, parents and natural  
12 guardians of JANE DOE, a minor,

13 Plaintiffs,

14 v.

15 CLARK COUNTY SCHOOL DISTRICT;  
16 CLARK COUNTY EDUCATION  
17 ASSOCIATION; DARRYL L. LANCASTER;  
18 KEMALA WASHINGTON,

19 Defendants.  
20

CASE NO 2:24-cv-00284-GMN-BNW

**STIPULATION TO EXTEND  
BRIEFING SCHEDULE WITH  
RESPECT TO DEFENDANT  
CLARK COUNTY EDUCATION  
ASSOCIATION'S MOTION FOR  
JUDGMENT ON THE  
PLEADINGS [ECF No. 38]  
(Second Request)**

21 Pursuant to Rule IA 6-1 of the Local Rules of Practice for the United States District  
22 Court, District of Nevada, Plaintiffs, John and Joann Doe, parents and guardians of Jane Doe  
23 ("Plaintiffs") and Defendants Clark County School District ("CCSD"); Clark County Education  
24 Association ("CCEA"); Darryl L. Lancaster ("Mr. Lancaster") and Kemala Washington ("Ms.  
25 Washington"), by and through their attorneys of record, stipulate and agree to extend the  
26 briefing schedule with respect to CCEA's Motion for Judgment on the Pleadings [ECF No. 38],  
27 which was filed on January 17, 2025, as follows:  
28

1           1.       CCEA filed its Motion for Judgment on the Pleadings [ECF No. 38] on Friday,  
2 January 17, 2025.

3           2.       The Motion for Judgment on the Pleadings seeks dismissal of each of Plaintiffs'  
4 claims asserted against CCEA, i.e., Title IX; Civil Rights under Sec. 1983; Violations of NRS  
5 Sec. 41.139655; Intentional Infliction of Emotional Distress; Negligence; Negligent Infliction of  
6 Emotional Distress; and Negligent Hiring, Training, and Supervision.

7           3.       The current deadline to respond to the Motion for Judgment on the Pleadings  
8 (“MJOP”) is February 21, 2025, pursuant to the parties’ prior (corrected) stipulation to extend  
9 the briefing schedule [ECF No. 42].

10          4.       When the MJOP was filed, Plaintiffs’ counsel was out of state conducting other  
11 depositions in another case on January 21 and 22, 2025 (when the prior deadline was January  
12 31, 2025). Upon returning to Nevada, Plaintiffs’ counsel previously-scheduled day-long  
13 depositions in another case for January 23 and 24, 2025. These previously scheduled  
14 depositions have effectively precluded Plaintiffs’ counsel from commencing the preparation of  
15 Plaintiffs’ intended response to the MJOP for the first week of the initial, two-week response  
16 period.

17          5.       Additionally, Plaintiffs’ counsel is currently studying for the Utah State Bar  
18 exam, which will occur on February 25-26, 2025. When Plaintiff’s counsel sought this  
19 extension request from CCEA’s counsel, Plaintiffs’ counsel affirmatively and correctly  
20 represented that significant steps had been taken with respect to the preparation of the  
21 pending/intended Opposition to the MJOP. However, with limited time remaining to prepare  
22 for the Utah Bar exam, coupled with adding, finalizing, editing, and otherwise completing the  
23 proposed Opposition, Plaintiff’s counsel requested and received an additional accommodation  
24 from CCEA’s counsel in light of these unique circumstances.

25          6.       Given the nature and complexity of the issues raised in the MJOP, coupled with  
26 Plaintiffs’ counsel’s prior commitments in other cases that have precluded Plaintiffs from being  
27 able to commence preparation of the intended Response, the parties agree that it is in the best  
28 interests of all to extend the briefing schedule with respect to the MJOP.



7. The parties have agreed to provide Plaintiffs with an extension until March 7, 2025, to provide their Response.

8. The parties have also agreed to allow CCEA to file its Reply brief on before March 28, 2025.

9. This is the parties' second request for an extension of the briefing with respect to the Motion for Judgment on the Pleadings [ECF No. 38]. The parties also affirm that this extension is not made with an improper purpose but is made in good faith in light of the present circumstances and the issues presented in the MJOP.

Dated this 16th of February, 2025.

Dated this 16th of February, 2025

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Dated this 19th of February, 2025

---and---

**Law Offices of Andrew M. Leavitt**

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*Attorney for Defendant, Mr. Lancaster*

Dated this 19th of February, 2025

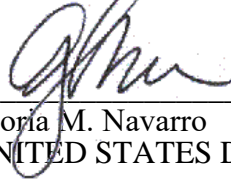
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**ORDER**

**IT IS SO ORDERED.**



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Gloria M. Navarro  
UNITED STATES DISTRICT JUDGE

Dated: February 19, 2025.

